

71227-1

11/24/2006

1/11

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

NOV 24 2006



Office of Pesticide Programs

Sinanen Co., Ltd  
4-27, Kaigan 1-Chome, Minato-ku  
Tokyo 105, Japan

AGENT: Technology Sciences Group, Inc.  
1150 18<sup>th</sup> Street, N. W.  
Suite 1000  
Washington, D. C. 20036

Attention: Erin M. Tesch

**Subject: Zeomic Type AJ Silver Zeolite A**  
EPA Registration No. 71227-1  
Notification Dated October 25, 2006

This will acknowledge receipt of your notification to clarify office equipment and supplies uses on the label, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your product file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely

A handwritten signature in cursive script that reads "Martha Terry".

Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)

2/11

Please read instructions on reverse before completing form.

Form Approval

OMB No. 2070-0060, Approval expires 2-28-95



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 71227-1	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Zeomic Type AJ Silver Zeolite A	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Sinanen Co., Ltd. 4-27, Kaigan 1-Chome, Minato-ku Tokyo 105, Japan <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is a notification to clarify the use of office equipments and supplies on the label per PR Notice 98-10 and is not subject to PRIA. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling of the Confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Erin M. Tesch	Title Regulatory Consultant	Telephone No. (Include Area Code) (202) 828-8966
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant	
4. Typed Name Erin M. Tesch	5. Date October 25, 2006	

33  
3/11



**WASHINGTON**

1150 18th Street, N.W.  
Suite 1000  
Washington, D.C. 20036  
Telephone 202 223-4392  
Fax 202 872-0745

October 25, 2006

Marshall Swindell, PM 33  
Antimicrobial Division (7510C)  
Office of Pesticide Programs. EPA  
1801 South Bell Street  
Arlington, VA 22202

**RE: Zeomic® Type AJ Silver Zeolite A  
EPA File Symbol 71227-1  
LABEL NOTIFICATION to clarify office equipment and supplies  
uses on the label per PR Notice 98-10**

Dear Mr. Swindell:

**SACRAMENTO**

712 Fifth Street  
Suite A  
Davis, CA 95616  
Telephone 530 757-1298  
Fax 530 757-1299

Technology Sciences Group, on behalf of Sinanen Company Ltd/AgION Technologies LLC is submitting a notification to clarify the previously approved use listed on the label for office equipment and supplies. This category of use would include binders, filing and storage systems, pens, pencils, markers, printers, facsimile machines, desk accessories, computers, keyboards, mice, scanners, printers, telephones, mobile devices, head phones, headsets and accessories.

You will find the following to support this notification:

- 1) Application form (EPA 8570-1);
- 2) One redline copy of the label (changes highlight in red font); and
- 3) Three clean copies of the revised label.

**CANADA**

275 Slater Street  
Suite 900  
Ottawa, Ontario  
K1P 5H9  
Telephone 613 247-6285  
Fax 613 236-3754

Please do not hesitate to contact me with any questions and/or concerns directly at (202) 828-8966 or via e-mail: [Etesch@tsgusa.com](mailto:Etesch@tsgusa.com)

Sincerely,

A handwritten signature in cursive script that reads "Erin M. Tesch".

Erin M. Tesch  
Regulatory Consultant for Sinanen Company Ltd / AgION Technologies  
LLC

cc: Paul Ford, AgION Technologies LLC

4/11

# **Zeomic® Type AJ**

## **Silver Zeolite A**

A preservative and bacteriostatic agent for use in the manufacture of polymer, plastic and latex products. For commercial and industrial use only.

**Active Ingredient:**

Silver	2.5 %
Other Ingredients	97.5 %
Total	100.0 %

**KEEP OUT OF REACH OF CHILDREN**

### **CAUTION**

**SEE INSERT LABEL FOR PRECAUTIONARY STATEMENTS**

---

Manufactured by:  
Sinanen Company, Ltd.  
4-22, Kaigan 1-Chome, Minato-ku  
Tokyo 105, Japan

EPA Registration No. 71227-1  
EPA Establishment No. 71227-JP-001

**Net Wt. XXXX**

**Lot No. XXXXXXXXXX**

## Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

**For all uses listed\*:**

- \* **Do not incorporate this product into any food contact polymer unless the subject food contact polymer is approved and listed in 21 CFR, Parts 174 through 186 (inclusive), or in the United States Food and Drug Administration's "Food Contact Substance Notification System." Any incorporation of this product into an approved and listed food contact polymer must comply with the specific use conditions listed in 21 CFR, Parts 174 through 186 (inclusive), or in the United States Food and Drug Administration's "Food Contact Substance Notification System," for such food contact polymer. Any incorporation of this product into any food contact substance (including but not limited to non-polymer substances) other than an approved and listed food contact polymer is prohibited.**
  
- \* **For applications involving direct or indirect food or human drinking water contact, Zeomic® Type AJ must be used with an FDA approved polymer or coating. Non-food and non-drinking water contact applications can use either FDA or non-FDA approved coatings.**
  
- \* **This product may be used for the following human drinking water contact uses:**
  - water filter components and housing units**
  - water bottle dispensers and components**
  - water dispensers**
  - ice machine trays**
  - ice machine bins**
  - ice machine water hoses**
  - ice dispensers and other ice machine components**
  - water bottles**
  - cups**
  - water storage vessels**
  
- \* **This product may be incorporated into food and water bowls, dishes and other containers used by domestic animals. Do not use for any food or drinking water applications involving non-domestic animals.**

***Zeomic® Type AJ Silver Zeolite A* is an antimicrobial additive to be used by compounding into many polymeric materials. It is designed to be incorporated during and after the manufacturing process to impart antimicrobial activity to the manufactured products. Approved post manufactured product upgrade applications are detailed in the label section titled "Coatings for Upgrade Applications." *Zeomic® Type AJ Silver Zeolite A* suppresses the growth of algae, mold, mildew, fungi and bacteria which cause unpleasant odors, discoloration, staining, deterioration or corrosion only. No finished product incorporating *Zeomic® Type AJ Silver Zeolite A* may make any public health claims relating to antimicrobial activity without first obtaining an EPA registration for the finished product which permits such claims, and without a tolerance or exemption from the requirement of a tolerance. When incorporated into treated articles, this product does not protect users of any such treated article or others against food borne or disease causing bacteria, viruses, germs or other disease causing organisms.**

## Types of Finished Products

### **Plastics - including films, sheets, slabs, and molded plastic parts**

The additive may be incorporated into the finished product at up to 5.0% by weight or at least 0.3% for bulk plastics. Contact Sinanen Company Ltd. to determine the appropriate amount of Zeomic® Type AJ Silver Zeolite A for individual finished products.

### **Food contact\* and non-food contact uses (in all food contact cases, when the article itself is a FDA-approved polymer):**

- packaging
- gaskets
- general purpose containers
- food and drink containers
- food trays and covers
- sponges
- plastic film
- food wrap (including coated deli paper, coated meat interleavers and plastic wrap)
- tubing
- brush bristles (including personal care grooming items, toothbrushes (Claims allowed: *odor, discoloration, staining*), and cosmetic brushes (Claims allowed: *odor, discoloration, staining*))
- liners
- non-woven fabrics
- appliances and equipment
- kitchen and food processing utensils and supplies
- cutting boards
- countertops
- sinks
- tiles
- dishes
- cups
- bottles
- conveyor belts
- food processing equipment (including slicers, formers, juicers, washers, canners, freezers, refrigerators, shelving, cookers, grinders, choppers, peelers and countertops)
- beverage processing equipment (including mixers, transfer equipment, pumps, bottlers, canners, dispensers and fermenters)
- garbage bags and garbage cans

### **Non-food contact uses only:**

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>automobile parts</li> <li>shower curtains</li> <li>mats</li> <li>protective covers</li> <li>tape</li> <li>waste containers</li> <li>brush handles</li> <li>mops</li> <li>vacuum cleaner bags</li> <li>plumbing supplies and fixtures (including toilet bowl seats)</li> <li>drain pan liners<sup>1</sup></li> <li>office equipment and supplies (including binders, filing and storage systems, pens, pencils, markers, printers, facsimile machines, desk accessories, computers, keyboards, mice, scanners, and printers)</li> <li>personal care items (including grooming items, toothbrushes (Claims allowed: <i>odor, discoloration, staining</i>), sports and dental mouthguards (Claims allowed: <i>odor, discoloration, staining</i>))</li> </ul> | <ul style="list-style-type: none"> <li>siding for housing</li> <li>kitchen and bathroom hardware</li> <li>flooring</li> <li>floor coverings</li> <li>footwear (including boots, sports equipment and tools)</li> <li>insulation for wire and cable</li> <li>insulators</li> <li>indoor and outdoor furniture</li> <li>toys (Claims allowed: <i>odor, discoloration, staining, deterioration</i>)</li> <li>spas, bathtubs, showers and filters and components thereof</li> <li>Telephones, mobile devices, head phones, headsets and accessories</li> <li>Cameras and imaging equipment</li> </ul> |
|--|---|

<sup>1</sup> For HVAC and related uses, refer to Zeomic® AJ Technical Bulletin No. 1 – Technical Bulletin for Zeomic® Type AJ Silver Zeolite A Polymeric Coating for Heating, Ventilation and Air Conditioning Applications.

7/11

**Fibers**

The additive may be incorporated into the finished product at up to 5.0% by weight or at least 0.1% for fibers. Contact Sinanen Company Ltd. to determine the appropriate amount of Zeomic® Type AJ Silver Zeolite A for individual finished products.

**Food contact\* and non-food contact uses (in all food contact cases, when the article itself is a FDA-approved polymer, or as a FDA-approved polymer coating on an article):**

- napkins, tablecloths and wiping cloths
- bags
- brush bristles (including personal care grooming items, toothbrushes (Claims allowed: *odor, discoloration, staining*), and cosmetic brushes (Claims allowed: *odor, discoloration, staining*))
- filters
- clothing apparel (including uniforms, outerwear, gloves, aprons, coats and shoes)
- sponges
- packaging (including bags, sacks, wraps, cushion and absorbent materials, and containers)
- conveyor belts
- kitchen, commercial and industrial wipes and fabrics

**Non-food contact uses only:**

*Interior furnishings -*

- mattress cover pads and filling
- pillow covers
- sheets
- blankets
- fiberfill for quilts and pillows
- curtains
- draperies
- carpet and carpet underlay
- rugs
- upholstery
- mops
- towels
- wall covering fabrics
- cushion pads
- sleeping bags

*Transportation -*

- automotive and truck upholstery
- carpeting
- rear decks
- trunk liners
- convertible tops
- interior liners

*Industrial and Other Household Items -*

- artificial leather
- filters
- book covers
- mops
- cloth for sails
- ropes
- tents and other outdoor equipment
- tarps
- awnings
- drain pan liners<sup>1</sup>

*Apparel -*

- umbrellas
- outerwear
- sportswear
- sleepwear
- stockings
- socks and hosiery
- caps
- undergarments
- inner liners for jackets
- trim for outerwear and garments

<sup>1</sup> For HVAC and related uses, refer to Zeomic® AJ Technical Bulletin No. 1 – Technical Bulletin for Zeomic® Type AJ Silver Zeolite A Polymeric Coating for Heating, Ventilation and Air Conditioning Applications.

8/11

## **Coatings, Films and Laminates**

The additive may be incorporated into the coating, film or laminate applied to the finished product at up to 5.0% by weight, or at least 0.05% for paper or 0.3% for bulk plastics. Contact Sinanen Company Ltd. to determine the appropriate amount of Zeomic® Type AJ Silver Zeolite A for individual finished products. Types of coatings include water-borne, solvent-borne, 100% solids, radiation cure, liquid and powder.

### **Food contact\* and non-food contact uses (in all food contact cases, when the article itself is a FDA-approved polymer, or as a FDA-approved polymer coating, film or laminate on an article):**

packaging  
paper products (including wipes and tissues)  
food wrap (including coated deli paper, coated meat interleavers and plastic wrap)  
natural and synthetic fibers and fabrics  
sinks  
countertops  
cutting boards  
dishes  
cookware  
general purpose containers  
kitchen, commercial and industrial utensils and supplies  
collection and storage equipment (including conveyor belts, piping systems, silos, tanks and process vessels)  
appliances and food processing equipment (including slicers, formers, juicers, washers, canners, freezers, refrigerators, shelving, cookers, grinders, choppers, peelers and countertops)  
beverage processing equipment (including mixers, transfer equipment, pumps, bottlers, canners and fermenters and dispensers)  
building materials and components (including walls, hardware, floors, ceilings and components thereof for kitchen, commercial and industrial applications)

### **Non-food contact uses only:**

walls  
wallboard  
floors  
concrete  
siding  
roofing  
shingles  
industrial equipment  
furniture  
automotive and vehicular parts  
packaging  
paper products (including wall coverings, towels, book covers)  
barrier fabrics  
glazing for cement tile  
glazing for vitreous china used in plumbing fixtures (including toilets, sinks, countertops)  
Heating, Ventilation and Air Conditioning equipment and related materials (including insulation, ducts, heat exchangers, drain pans, air filters, air purifiers, diffusers, and parts and components thereof)<sup>1</sup>  
spas, bathtubs, showers, and filters and components thereof

---

<sup>1</sup> For HVAC and related uses, refer to Zeomic® AJ Technical Bulletin No. 1 – Technical Bulletin for Zeomic® Type AJ Silver Zeolite A Polymeric Coating for Heating, Ventilation and Air Conditioning Applications.



## **Coatings for Upgrade Applications**

Upgrade Applications are defined as the incorporation of Zeomic into polymeric coatings that are applied to articles onsite (after the article has been manufactured and is in the place of use). Coatings may be used on articles that have not previously incorporated the antimicrobial compound. Zeomic may be incorporated into the finished coating at up to 5.0% by weight, or at least 0.5% of the coating. Types of coatings include waterborne coatings/adhesives, solvent borne coatings and two part reactive coatings consisting of a resin and curing agent. Upgrade Applications are for onsite application at Commercial, Industrial or Institutional Establishments. Unless otherwise specified in the technical bulletin, the coating is applied to the entire article. Contact Sinanen Company Ltd. or refer to Zeomic AJ Technical Bulletin No. 2 and No. 3 to determine the appropriate application technique and amount of Zeomic for individual products.

### **Food contact\* and non-food contact articles (in all food contact cases, when the article itself is a FDA-approved polymer, or as a FDA-approved polymer coating on an article)<sup>2</sup>:**

- food collection, conveyance and storage equipment (including conveyor belts, silos, tanks and process vessels)
- appliances and food processing equipment (including slicers, formers, juicers, washers, canners, freezers, refrigerators, shelving, cookers, grinders, choppers, peelers, and countertops)
- beverage processing and ice machine equipment (including mixers, transfer equipment, pumps, bottlers, canners, fermenters and dispensers and other components)
- food and chemical transportation equipment including railcars, tankers, trailers and components thereof
- building materials and components (including walls, ceilings and floors consisting of concrete, gypsum board, and cellulose ceiling tile)

Incorporate this product into coatings that are intended for application to the surface of articles. The purpose of the coating is to seal the article from moisture and corrosion. The purpose of Zeomic® in the coating is to inhibit the growth of mold, mildew, fungus and bacteria that cause odor, discoloration, staining, deterioration or corrosion on the surface of the coating film. The product protects the applied coating itself from microorganism attack, not the underlying substrate. This product is not intended for remediation, prevention or control of existing or anticipated public health related microorganisms. Refer to Zeomic® AJ Technical Bulletin No. 2 for complete application directions.

### **HVAC articles<sup>3</sup>:**

Heating, ventilation and air conditioning systems and related materials including air handlers, drain pans, heat exchangers, distribution lines, flexible ductwork, diffusers, and insulation lined porous ductwork.

Incorporate this product into coatings that are intended for application to HVAC systems. The purpose of the coating is to seal the HVAC system from moisture and corrosion. The purpose of Zeomic® in the coating is to inhibit the growth of mold, mildew, fungus and bacteria that cause odor, discoloration, staining, deterioration or corrosion on the surface of the coating film. The product protects the applied coating itself from microorganism attack, not the underlying substrate. This product is not intended for remediation, prevention or control of existing or anticipated public health related microorganisms. Refer to Zeomic® AJ Technical Bulletin No. 3 for complete application directions.

<sup>2</sup> For these listed applications, refer to Zeomic® AJ Technical Bulletin No. 2 – Technical Bulletin for Zeomic® Type AJ Silver Zeolite A Polymeric Coating for Non-Residential, Non-HVAC Upgrade Applications.

<sup>3</sup> For these listed HVAC Applications, refer to Zeomic® AJ Technical Bulletin No. 3 – Technical Bulletin for Zeomic® Type AJ Silver Zeolite A Polymeric Coating for Non-Residential, HVAC Upgrade Applications.

10/11

### **Adhesives and Sealants**

The additive may be incorporated into the finished product at up to 5.0% by weight, or at least 0.05% for paper or 0.3% for bulk plastics. Contact Sinanen Company Ltd. to determine the appropriate amount of Zeomic® Type AJ Silver Zeolite A for individual finished products.

#### **Food contact\* and non-food contact uses (in all food contact cases, when the article itself is a FDA-approved polymer incorporated into FDA-approved adhesives or sealants):**

plumbing adhesives  
pipe sealants and insulating materials  
grout and joint compound for; countertops, building materials and components, and food and beverage related equipment

#### **Non-food contact uses only:**

adhesives used in the manufacture of wood and plastic composites  
adhesives for ceramic tile, wood, paper, cardboard, rubber and plastic  
glazing for windows  
grout  
sealants for pipes  
adhesives, sealants and insulating materials for; appliances, bathrooms, showers, kitchens and construction

### **Miscellaneous Applications**

The additive may be incorporated into the finished product at up to 5.0% by weight. Contact Sinanen Company Ltd. to determine the appropriate amount of Zeomic® Type AJ Silver Zeolite A for individual finished products.

#### **Non-food contact uses only:**

toilets  
sinks  
tile  
flooring  
stucco  
plaster  
cat litter  
drainage and sewerage pipe  
interior paints and coatings

///

### PRECAUTIONARY STATEMENTS

**Hazards to Humans:** Harmful if inhaled or absorbed through skin. Causes moderate eye irritation. Avoid breathing dust. Avoid contact with skin, eyes or clothing. Wear goggles or face shield and rubber gloves when handling the dry powder. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID	
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 – 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

### Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

**Pesticide Storage:** Do not store in areas accessible to children. Keep product dry and containers covered during storage; store below 130°F.

**Container Disposal: Inner Plastic Bag:** Completely empty plastic bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke. **Outer Steel Can:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

**Pesticide Disposal:** Wastes from the use of this product may be disposed of on site or at an approved waste disposal facility.